

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

DAVID SAMBRANO, individually and on
behalf of all others similarly situated, *et al.*,

Plaintiffs,

v.

UNITED AIRLINES, INC.,

Defendant.

Civil Action No.: 4:21-01074-P

**JOINT LIST OF EXHIBITS ADMITTED DURING
THE PRELIMINARY INJUNCTION HEARING**

Listed below are all exhibits Plaintiffs admitted during the Preliminary Injunction hearing held on October 13-14, 2021:

EXHIBIT NO.	DESCRIPTION
1	Affidavit of David Eric Sambrano (ECF No. 7 at 1–5)
2	Affidavit of Kimberly Anne Hamilton (ECF No. 7 at 6–11)
3	Affidavit of Seth Adam Turnbough (ECF No. 7 at 12–16)
4	Affidavit of David Michael Castillo (ECF No. 7 at 17–21)
5	Affidavit of Debra Jennefer Thal Jonas (ECF No. 7 at 22–26)
6	Affidavit of Genise Gale Kincannon (ECF No. 7 at 27–31)
7	Affidavit of David Llen Lockwood (ECF No. 7 at 32–35)
8	Copy of text K. Hamilton submitted in support of RAP
9	Coronavirus Q&A Updated September 7, 2021 from Flying Together
10	September 19, 2021 email from Jodi Stringfellow to all DFW employees

EXHIBIT NO.	DESCRIPTION
11	August 4, 2021 letter from Dr. George Katsamakis
12	May 20, 2021 page from Dr. George Katsamakis' progress notes on exam of S. Turnbough
13	September 21, 2021 email from United to S. Turnbough
14	United HelpHub internet document "COVID-19 Vaccination: Medical Accommodations" as of September 29, 2021
15	August 25, 2021 letter from D. Sambrano to United HR in support of RAP
16	September 14, 2021 COVID-19 Vaccine Medical Exemption form submitted to United by D.J. Jonas
17	August 18, 2021 Screenshot of G. Kincannon's explanation of need for RAP
18	Declaration of Dr. Jayanta Bhattacharya
19	Curriculum Vitae of Dr. Jayanta Bhattacharya
20	Declaration of Fred Bates
21	Curriculum Vitae of Fred Bates
22	Hiam Chemaitelly et al., <i>Waning of BNT162b2 vaccine protection against SARS-CoV-2 infection in Qatar</i> , MEDRXIV, Aug. 27, 2021 (preprint), doi:10.1101/2021.08.25.21262584. (FN17)
23	Zachary J. Madewell et al., <i>Household Transmission of SARS-CoV-2: A Systematic Review and Meta-analysis</i> , 3 JAMA NETW. OPEN e2031756 (2020). (FN35)
24	Sivan Gazit et al., <i>Comparing SARS-CoV-2 natural immunity to vaccine-induced immunity: reinfections versus breakthrough infections</i> , MEDRXIV, Aug. 25, 2021, https://doi.org/10.1101/2021.08.24.21262415 . (FN46)
25	Richard K. Zimmerman, <i>Helping patients with ethical concerns about COVID-19 vaccines in light of fetal cell lines used in some COVID-19 vaccines</i> , 39 VACCINE 4242–4244 (2021). (FN58)

EXHIBIT NO.	DESCRIPTION
26	Supplemental Affidavit of Deba Jennefer Thal Jonas (ECF No. 38 at 1-4)
27	September 9, 2021 Email from HelpHub to David Sambrano
28	United Airlines' employee website as of October 5, 2021, labeled Covid-19 Vaccination: Religious Accommodation
29	Video Clip of Scott Kirby during United Town Hall
30	Kincannon – Email Link to United “COVID-19 Vaccination: Religious Accommodations” from United Website
31	Supplemental Declaration of Debra Jennefer Thal Jonas, attaching documents submitted during RAP
32	United: What to Expect When You Fly

Listed below are all exhibits Defendant admitted during the Preliminary Injunction hearing held on October 13-14, 2021:

EXHIBIT NO.	DESCRIPTION
1	United's COVID-19 Vaccination Policy dated Aug. 5, 2021
2	United's COVID-19 Vaccination Policy dated Aug. 23, 2021
3	Face Covering / Mask Policy dated Aug. 18, 2021
4	Demonstrative Chart of Accommodation Requests
5	Spreadsheet of United Employees Who Received Remote Work as Accommodation as of Oct. 1, 2021
6	Chart of United Costs Related to COVID-19 Insurance Claims
7	Email Sent to Employees Requesting a Reasonable Accommodation dated Sept. 9, 2021
8	Explanation of Medical Accommodations, Available on Help Hub
9	Explanation of Religious Accommodations, Available on Help Hub
10	Pilot Bulletin No. 21-273 Regarding “Face Mask Requirements and Eye Protection Guidance” Effective Sept. 30 – Dec. 31, 2021
11	SRA Regarding Usage of Facemasks

EXHIBIT NO.	DESCRIPTION
12	Employee Vaccine Postcard dated Aug. 30, 2021
13	OSHA Complaint No. 1818391
14	Expert Report of Dr. Carlos Del Rio dated Oct. 5, 2021
15	CV of Professor Shane Crotty dated Oct. 2, 2021
16	Declaration of Shane Crotty ¹
17	Declaration of Kirk Limacher
18	Supplemental Declaration of Kirk Limacher
19	David Sambrano Flight Schedules, Jan. 1, 2018-present
20	Genise Kincannon Flight Schedules, Jan. 1, 2018-present
21	Seth Turnbough Flight Schedules, Jan 1, 2016-present
22	Seth Turnbough Sept. 2021 Pay Register
23	David Lockwood Vaccination Card dated Sept. 2, 2021
24	Letter to Employees on Leaves of Absence
25	Letter to Employees on Leaves of Absence FA&Pilot
26	Reasonable Accommodations Notifications Language as of Sept. 26, 2021
27	Reasonable Accommodations Vaccine Notifications
28	<i>Basics of COVID-19</i> , Centers for Disease Control and Prevention (May 24, 2021), https://www.cdc.gov/coronavirus/2019-ncov/your-health/about-covid-19/basics-covid-19.html
29	<i>Delta Variant: What We Know About the Science</i> , Centers for DiseaseControl and Prevention (Aug. 26, 2021), https://www.cdc.gov/coronavirus/2019-ncov/variants/delta-variant.html
30	<i>Reduced Risk of Reinfection with SARS-CoV-2 After COVID-19 Vaccination— Kentucky, May–June 2021</i> , Centers for Disease Control and Prevention(Aug. 13, 2021), at https://www.cdc.gov/mmwr/volumes/70/wr/mm7032e1.htm
31	<i>SARS-CoV-2 Infections and Hospitalizations Among Persons Aged ≥16Years, by Vaccination Status — Los Angeles County, California, May 1–July25, 2021</i> , Centers for Disease Control and

EXHIBIT NO.	DESCRIPTION
	Prevention (Aug. 27, 2021), at https://www.cdc.gov/mmwr/volumes/70/wr/mm7034e5.htm
32	<i>Transcript of March 27, 2020 Outreach Webinar</i> , U.S. Equal Employment Opportunity Commission (Mar. 27, 2020), at https://www.eeoc.gov/transcript-march-27-2020-outreach-webinar#q1

October 18, 2021

Respectfully submitted,

/s/ Robert C. Wiegand

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been served via the Court's electronic filing system upon all counsel of record.

/s/ Robert C. Wiegand
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